JAP:ALC

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

M10-1049

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

KEVON RANDELL BELFON,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

JEFFERY PERRY, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about September 10, 2010, within the Eastern District of New York and elsewhere, defendant KEVON RANDELL BELFON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:

- 1. On or about September 10, 2010, KEVON RANDELL
 BELFON arrived at John F. Kennedy International Airport ("J.F.K.
 Airport") in Queens, New York, aboard Caribbean Airlines Flight
 520 from Port of Spain, Trinidad.
- 2. Defendant KEVON RANDELL BELFON was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one blue "Gabbiano" suitcase and one grey/orange "Gabbiano" suitcase. The defendant answered in the affirmative when asked if both suitcases and their contents belonged to him.
- RANDELL BELFON's suitcases, a CBP officer observed that the inside lining of the suitcase felt unusually thick and bumpy. The lining was probed to reveal a powdery substance that field-tested positive for the presence of cocaine. The defendant KEVON RANDELL BELFON's other suitcase was thereafter probed to reveal a powdery substance that field-tested positive for the presence of cocaine.
 - 4. The total approximate gross weight of the cocaine

Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

found in the defendant KEVON RANDELL BELFON's suitcases is 2,553.2 grams.

WHEREFORE, your deponent respectfully requests that defendant KEVON RANDELL BELFON be dealt with according to law.

JEFFREY PERRY Special Agent

U.S. Department of Homeland Security Immigration and Customs Enforcement

Sworn to pefore me this/

LSKY

EASTERN DISTRICT OF NEW YORK